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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JACOB SMITH,)	Case No. 2:20-cv-03755
)	
Plaintiff,)	
)	Judge Edmund A. Sargus
v.)	Magistrate Judge Kimberly A. Jolson
)	
FIRSTENERGY CORP., <i>et al.</i> ,)	
)	
Defendants.)	
)	
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JAMES BULDAS,)	Case No. 2:20-cv-03987
)	
Plaintiff,)	Judge Edmund A. Sargus
)	Magistrate Judge Kimberly A. Jolson
v.)	
)	
FIRSTENERGY CORP., <i>et al.</i> ,)	
)	
Defendants.)	
)	
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BRIAN HUDDOCK and CAMEO)	Case No. 2:20-cv-03954
COUNTERTOPS, INC.,)	
)	Judge Edmund A. Sargus
Plaintiffs,)	Magistrate Judge Kimberly A. Jolson
)	
v.)	
)	
FIRSTENERGY CORP., <i>et al.</i> ,)	
)	
Defendants.)	
)	

**DECLARATION OF GREGORY MICHAEL GALVIN IN SUPPORT OF AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND AWARD OF
INCENTIVE PAYMENTS TO CLASS REPRESENTATIVES**

I, Gregory Michael Galvin declare as follows:

1. I am an attorney licensed to practice before the courts of Ohio, South Carolina, District of Columbia and the United States Patent and Trademark Office as a Patent Attorney, and am the sole parnter in the law firm Galvin Law Group, LLC (“GLG”). I have personal knowledge of the facts stated in this Declaration and, if called as a witness, I would testify competently to them. I make this Declaration in support of GLG’s request for attorneys’ fees and reimbursement of litigation expenses, as set forth in Class Plaintiffs’ Unopposed Motion For Award of Attorneys’ Fees, Costs, and Incentive Awards To Class Representative Plaintiffs (the “Fee Motion”) (ECF No. 145).

2. I am counsel of record for Plaintiff Michael Emmons in a class action lawsuit pending in the Cuyahoga County Court of Common Pleas styled *Emmons v. FirstEnergy Corp.*, Case No. CV-20 935557.

3. A brief description my firm, which includes a short summary of my experience and credentials, is attached as Exhibit 1 and incorporated herein by reference.

4. Throughout the course of this litigation, my firm kept files contemporaneously documenting all time spent, including tasks performed, and expenses incurred, and shared those reports on a regular basis with James L. Ward, Jr., who is Class Counsel for the Settlement Class along with Dennis E. Murray, Jr. and Marvin A. Miller. See ECF No. 142 (preliminary approval order appointing Messrs. Murray, Miller, and Ward as Class Counsel). All the time and expenses reported by my firm advanced the tremendous class-wide result achieved in this case.

5. Such work included acting as lead counsel for the Emmons litigation. In addition, I assisted in performing the initial examination of the case to determine if the case was viable under Ohio, or Federal Law and I managed all discovery both produced and received in this case. My management of discovery ranged from creation of load files with custom software to the ingestion

of all discovery produced in any manner in the litigation to allow co-counsel to quickly review the information produced. In addition, as lead counsel I played a significant role in mediation and to coordinate with co-counsel to develop strategies to both advance the litigation and ultimately to reach a resolution to this matter.

6. The schedule attached as Exhibit 2, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation. It does not include any time devoted to preparing this Declaration or otherwise pertaining to the Fee Motion. The lodestar calculation is based on my firm's billing rates in effect at the time services were performed. Exhibit 2 was prepared from contemporaneous time records regularly prepared and maintained by my firm. Those records have been provided to Class Counsel, and I authorize them to be submitted for inspection by the Court if necessary. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit 2 were, at the time the work was performed, the usual and customary hourly rates charged for their services in similar complex litigation.

7. The total number of hours reasonably expended on this litigation by my firm from inception through July 31, 2022, which does not include time spent preparing this Declaration or preparing the Fee Motion, is Five Hundred Twenty-Nine and One Tenth hours (529.10). The total lodestar for my firm at historical rates is Eight Hundred Dollars per hour (\$800.00). The total lodestar for my firm at current rates is Four Hundred Twenty Three Thousand Two Hundred Eighty and 00/100s (\$423,280.00). Expense items are billed separately and are not duplicated in my firm's lodestar.

8. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, invoices, receipts, check records, and other source materials and accurately reflect the expenses incurred.

My firm's expense records are available for inspection by the Court if necessary.

9. My firm incurred a total of Four Thousand Three Hundred Ninety-Eight and 52/100ths Dollars (\$4,398.52) in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. Of this amount, One Thousand Seven Hundred Seventy-Three and 09/100ths (\$1,773.09) was for assessment payments for common litigation expenses or direct payments to experts or other vendors made at the request of class counsel, or as determined was needed by lead counsel, and an additional Two Thousand Six Hundred Twenty Five and 43/100ths Dollars (\$2,625.43) was for non-common litigation expenses incurred by my firm, such as travel, meals and lodging, copying, legal research, and telephone. A summary of these expenses by category is attached as Exhibit 3.

10. In the event my firm provides additional services or incurs additional costs, I will supplement this declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of October, 2022, in Bluffton, South Carolina.

s/ *Gregory Michael Galvin*
Gregory Michael Galvin

GALVIN LAW GROUP, LLC
EXHIBIT 1

The Galvin Law Group, LLC is a law firm focusing on civil and criminal litigation as well as real estate closings. For the past 20 years, Gregory Michael Galvin, Esq. has earned a reputation for handling some of the most difficult and complex cases, including federal and state criminal defense, class actions, and personal injury cases. Galvin Law Group also brings extensive computer expertise in reviewing computer logs, phone records, and other important aspects of your case that are stored on computers or electronic devices. Indeed, Mr. Galvin received an award from the U.S. District Court for the District of South Carolina for assisting the court with technology issues.

EXHIBIT 2

**Galvin Law Group, LLC
Summary by Timekeeper and Activity**

<u>Attorney</u>	<u>Rate</u>	<u>Hours</u>	<u>Lodestar</u>
Gregory Michael Galvin	\$800.00	529.1	\$423,280.00
TOTAL			\$423,280.00

Date	Parent Category	Subcategory	Merchant	Description	Amount
08/07/20	Office Expenses & Postage	Postage	USPS	Preservation letters with envelope costs	\$30.00
10/26/20	Office Expenses & Postage	Office Expenses & Postage	USPS	Certified Letter costs	\$6.00
10/26/20	Rent or Lease	Equipment	amazon	Hard Drives for Data Storage	\$331.68
11/08/20	Contractors	Contractors (general)	Bennett Marsh	Puco Webscraping	\$50.00
12/06/20	Professional Services	Professional Services (general)	Bennett Marsh	Write Webscraping for PUCO Filings	\$65.00
06/23/21	Other Expenses	Other Expenses (general)	Best buy	Router for casedoxx	\$267.49
06/24/21	Car & Truck Expenses	Mileage		1510 miles to travel to mediation	\$845.60
06/27/21	Other Expenses	Food	Gronders		\$96.45
07/23/21	Travel	Hotel/Lodging	The Ballantine		\$497.63
07/25/21	Meals & Entertainment	Restaurants/Dining	Barrio		\$284.61
08/24/21	Office Expenses & Postage	Software	amazon	Acronis Backup for server	\$99.99
10/15/21	Office Expenses & Postage	Software	amazon	Backup software for discovery data	\$69.99
12/10/21	Other Expenses	misc		backup hard drive	\$288.90
12/10/21	Other Expenses	misc		Backup Enclosure	\$32.09
12/10/21	Supplies	Supplies (general)	Amazon	backup for case documents	\$288.90
12/19/21	Other Expenses	Other Expenses (general)	Peking Chinese Restaurant		\$16.16
12/20/21	Car & Truck Expenses	Mileage		Travel to Mediation - 1510 miles	\$845.60
12/20/21	Meals & Entertainment	Meals & Entertainment	Domino's		\$23.38
12/21/21	Other Expenses	Other Expenses (general)	West va	Tolls	\$16.00
01/14/22	Office Expenses & Postage	Postage		Subpoena to CRA mailing costs	\$13.33
01/20/22	Office Expenses & Postage	Postage	USPS		\$7.13
04/13/22	Other Expenses	Other Expenses (general)	amazon	Hard drive for transfer of data.	\$222.59

Grand Total	\$4,398.52
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